

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

<p>AMERICAN PEARL GROUP, LLC, a Texas limited liability company; JOHN SARKISSIAN, an individual; ANDREI WIRTH, an individual</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>NATIONAL PAYMENT SYSTEMS, LLC, a Wyoming limited liability company; BECKVENTURES, LLC, a Delaware limited liability company; and Does 1-20, inclusive,</p> <p style="text-align: center;">Defendants.</p>	<p style="text-align: center;">Case. No.: 3:22-cv-00693-N</p> <p style="text-align: center;">STIPULATED MOTION TO EXTEND DEADLINE FOR DEFENDANTS TO FILE A RESPONSIVE PLEADING OR RULE 12(B) MOTION IN RESPONSE TO THE COMPLAINT</p>
--	---

Defendants NATIONAL PAYMENTS SYSTEMS, LLC (“NPS”) and BECKVENTURES, LLC (“Beckventures,” and collectively with NPS, “Defendants”), pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Rule 7.1, hereby move the Court for an Order granting an extension of the deadline by which they may file a responsive pleading or Rule 12(b) motion in the above-captioned matter. Plaintiffs have stipulated to the Motion.

On March 25, 2022, Plaintiff American Pearl Group, LLC (“Pearl”) filed and served its Complaint (Doc. 1). In accordance with Fed. R. Civ. P. 12, the deadline by which Plaintiff may file a responsive pleading or a motion under Rule 12(b) is April 15, 2022. Defendants request a 15-day extension of the deadline to file a responsive pleading or a motion under Rule 12(b), which is May 2, 2022. Defendants, in conformity with Local Rule 7.1(b), certify that the Parties have conferred and that this Motion is unopposed, as Plaintiffs have consented to the requested extension.

Therefore, Plaintiff respectfully requests the Court enter an Order granting this motion, extending the deadline to file a responsive pleading or a motion under Rule 12(b) to May 2, 2022.

Respectfully submitted this 15th day of April, 2022,

By /s/ Adam Sanderson

REESE MARKETOS LLP

Adam Sanderson
750 N. Saint Paul St., Suite 600
Dallas/TX/75201
(214) 382-9810
adam.sanderson@rm-firm.com

KUTAK ROCK LLP

Oliver D. Griffin (*pro hac vice pending*)
CO Bar No. 52292
KUTAK ROCK LLP
1801 California Street
Suite 3000
Denver, CO 80202
(303) 297-2400
oliver.griffin@kutakrock.com

Jeffrey M. Giancana (*pro hac vice pending*)

AZ Bar No. 035031
8601 North Scottsdale Road, #300
Scottsdale, AZ 85253
(480) 429-4834
jeffrey.giancana@kutakrock.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all the registered participants.

REEVE, AUGUSTINE, ALARAKHIA, PLLC

Ashley Reeve Basnett
P.O. Box 1398
Athens, TX 75751
(903) 887-0602
ashley@reeveaugustine.com

CATANZARITE LAW CORPORATION

Kenneth J. Catanzarite
2331 West Lincoln Avenue
Anaheim, CA 92801
(714) 678-2100
kcatanzarite@catanzarite.com

Attorneys for Plaintiffs

By /s/ Adam Sanderson

REESE MARKETOS LLP

Adam Sanderson
750 N. Saint Paul St., Suite 600
Dallas/TX/75201
(214) 382-9810
adam.sanderson@rm-firm.com

KUTAK ROCK LLP

Oliver D. Griffin (*pro hac vice pending*)
CO Bar No. 52292
KUTAK ROCK LLP
1801 California Street
Suite 3000
Denver, CO 80202
(303) 297-2400
oliver.griffin@kutakrock.com

Jeffrey M. Giancana (*pro hac vice*
pending)

AZ Bar No. 035031

8601 North Scottsdale Road, #300

Scottsdale, AZ 85253

(480) 429-4834

jeffrey.giancana@kutakrock.com

Attorneys for Defendants

CERTIFICATE OF CONFERENCE

I hereby certify that the Parties conferred on the Stipulated Motion to Extend Deadline for Defendants to File a Responsive Pleading or Rule 12(B) Motion in Response to the Complaint, and the Motion is Unopposed.

By /s/ Adam Sanderson

REESE MARKETOS LLP

Adam Sanderson
750 N. Saint Paul St., Suite 600
Dallas/TX/75201
(214) 382-9810
adam.sanderson@rm-firm.com

KUTAK ROCK LLP

Oliver D. Griffin (*pro hac vice pending*)
CO Bar No. 52292
KUTAK ROCK LLP
1801 California Street
Suite 3000
Denver, CO 80202
(303) 297-2400
oliver.griffin@kutakrock.com

Jeffrey M. Giancana (*pro hac vice pending*)
AZ Bar No. 035031
8601 North Scottsdale Road, #300
Scottsdale, AZ 85253
(480) 429-4834
jeffrey.giancana@kutakrock.com

Attorneys for Defendants